Remarks

Entry of the amendment, reconsideration of the application, as amended, and allowance of all pending claims are respectfully requested. Claims 1-16 are now pending.

Applicants have herein added dependent claim 16 to more particularly point out and distinctly claim additional features of applicants' invention. Support for this new claim can be found throughout the application. See, for example, p. 18, lines 1-7 of applicants' specification (see also p. 7, lines 18-23; p. 10, lines 14-18; and p. 11, lines 3-8). Thus, no new matter is added by the amendment presented herewith.

As recited in claim 16, the method of claim 1 (as amended in the above-noted Response) is further characterized to include providing the apparatus with a limited Java Virtual Machine (JVM) being able to execute only a subset of Java instructions, and accessing, by the apparatus, a full JVM residing at a computing unit coupled to the apparatus, the accessing allowing the apparatus to execute additional Java instructions. Applicants respectfully submit that Wilkinson and Sherer fail to teach or suggest the recited features of claim 16, either alone or in combination.

For example, Wilkinson discloses an integrated circuit card implementing a limited JVM. This implementation in Wilkinson allows programmers to program in a subset of Java instructions while maintaining compatibility with existing full JVMs (see col. 13, fines 13-27 thereof). This compatibility merely ensures that a device that includes a full JVM can execute a card's program that is written using only the subset of Java instructions. There is no discussion or suggestion in Wilkinson that the compatibility works in the other direction. That is, the card in Wilkinson does not have the capability to execute Java instructions of a full JVM, wherein the instructions are in addition to those in the subset of Java instructions. Applicants respectfully submit that this is different from an apparatus (e.g., card) provided with a limited JVM accessing a full JVM residing at a computing unit coupled to the apparatus, wherein the accessing allows the apparatus to execute additional Java instructions, as recited by claim 16.

Sherer, like Wilkinson, does not teach or suggest the above-described feature recited in claim 16. A careful reading of Sherer fails to uncover any discussion of Java instructions or of a

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limited or full JVM, let alone the above-described accessing of a full JVM by an apparatus provided with a limited JVM.

Based on the foregoing, applicants respectfully submit that the subject matter of claim 16 patentably distinguishes over the applied art. Thus, an indication of allowability of claim 16 is respectfully requested.

Should the Examiner wish to discuss this case with applicants' attorney, please contact applicants' attorney at the below-listed number.

Respectfully submitted,

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